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October 12, 2012

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notification – RM No. 11640; WT Docket No. 12-69

Dear Secretary Dortch:

On October 10, 2012, Len Schiff, Souheil Gallouzi, Eduardo Esteves, Mahesh Makhijani, David Nash, Durga Malladi, Shawn Covell, and I, all of Qualcomm Incorporated (“Qualcomm”), met with Commissioner Ajit Pai and Courtney Reinhard, his Legal Advisor.

During the meeting, Mr. Schiff and I discussed Qualcomm’s Petition for Rule Making to establish a Next-Generation Air-Ground Service in the 14-14.5 GHz band. A copy of the presentation that we gave to Commissioner Pai and Ms. Reinhard accompanies this filing. Mr. Schiff and I explained that the technology being developed by Qualcomm will support high speed broadband connectivity for airplane passengers using smartphones, tablets, and laptops—the full range of wireless devices that are used so intensely on the ground. We also stated that Qualcomm’s Petition used very conservative technical assumptions, and that the record establishes that there will not be any interference either to or from the incumbent users of the band. We showed Commissioner Pai and Ms. Reinhard a prototype ground station antenna that the proposed service would use and explained that the capital expenditures for the proposed terrestrial-based Next Gen Air-Ground Service would be substantially less than satellite-based systems. We reiterated Qualcomm’s request that the Commission issue a Notice of Proposed Rule Making to consider Qualcomm’s proposal.

Mr. Nash and I also discussed features of Qualcomm’s chips. We explained that all of Qualcomm’s chips are multi-mode and multi-band. We stated that Qualcomm’s most advanced RF chip, the WTR1605L, provides native support for seven frequency bands—three of which can be below 1 GHz. We also explained that we provide chips supporting Band 12 in the Lower 700 MHz band, and, thus, there is no need for the FCC to impose any interoperability mandate related to that band.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'D. R. Brenner', written over a horizontal line.

Dean R. Brenner
Vice President, Government Affairs

cc (via email):

Commissioner Ajit Pai
Courtney Reinhard

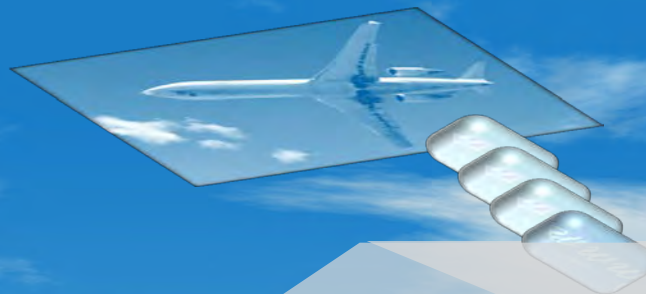
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Next-Generation Air-Ground Communications Service – from Petition for Rulemaking to NPRM

October 10, 2012



The Sky IS THE LIMIT!



**AIR - GROUND
TECHNOLOGY**

- ☐ Next Generation Air-Ground (Next Gen AG) service will enable high-speed airborne broadband access (300 Gb/s on a combined basis) to commercial and private plane passengers
- ☐ Will support (via in-cabin Wi-Fi) the same broadband experience available on land, e.g., on-demand video, gaming, music, and other cloud services

Timeline & Summary

Next-Gen AG Petition for Rulemaking

Timeline

- Petition for Rulemaking filed July 2011
- Comments/Replies filed Sept/Oct 2011
- Pre- and post-filing outreach to SIA
- Responses to FCC staff questions Jan 2012
- Second round of comments July 2012

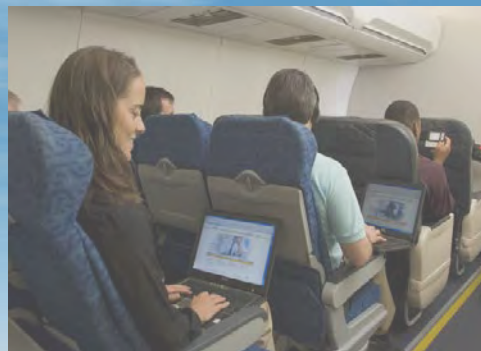
Summary

- Broad support from major airlines, equipment makers, and current air-ground service provider
- Record establishes that the proposed service can operate on a secondary licensed basis in successful coexistence with primary FSS operations and other users of the 14.0 to 14.5 GHz band



Next Gen AG Petition for Rulemaking

The record demonstrates that today's airline passenger expects the same level of service in the air that is currently available on the ground.



24/7 Connectivity

Increasing need for airline travelers to stay connected 24/7 for cloud computing, social networking, and entertainment.



High Speed Broadband

Fast connections are key to enabling music and video cloud offerings, content download, gaming and HD video streaming.

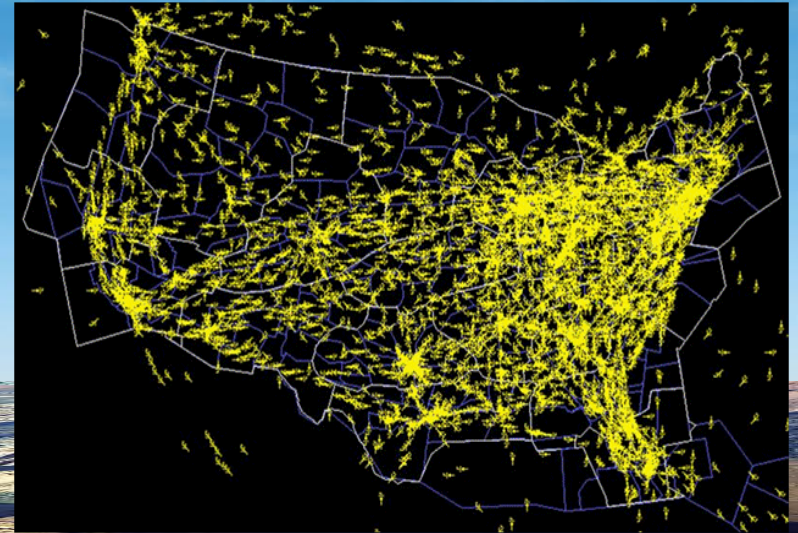
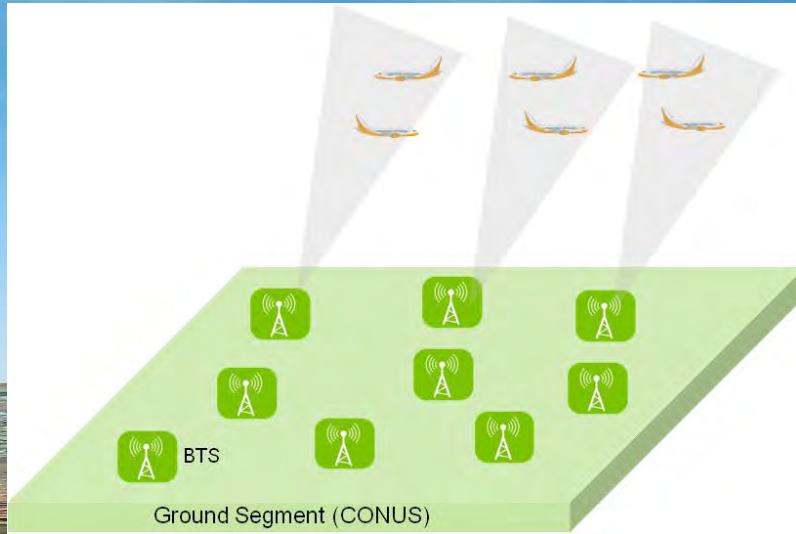


Multimedia Content

Access to the full library of Internet content: TV channels, movies, games, educational content and social media.

Next-Gen AG System Design

In-flight Broadband System Operating at 14.0 – 14.5 GHz On Secondary Licensed Basis



Key Technology Attributes

- Enables high throughput services such as video streaming, gaming, and other rich multimedia access
- Air-Ground architecture will use several hundred cell sites covering CONUS
- Can support approximately 2 Gb/s throughput per site in existing Ku band FSS uplink spectrum

Co-existence

- Designed to avoid interference with incumbent GSO satellite operations and possible future NGSO satellite services
- Designed to successfully co-exist with other services, including AMSS, TDRSS and radio astronomy